

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

---

**CONSUMER FINANCIAL PROTECTION  
BUREAU,**

**Plaintiff,**

**v.**

**TOWNSTONE FINANCIAL, INC., et al.,  
Defendants.**

**Civil Action No. 1:20-cv-04176**

Judge Franklin U. Valderrama

Magistrate Judge Gabriel A. Fuentes

---

**DEFENDANT TOWNSTONE FINANCIAL, INC. AND BARRY STURNER'S  
MOTION TO STAY DISCOVERY**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Defendants move this Court to stay discovery pending its ruling on Defendants' Motion to Dismiss. Dkt. Nos. 31, 32. This Motion is supported by a Memorandum in Support, which is filed contemporaneously herewith and incorporated herein by reference. In sum, Defendants seek a stay because: (1) Defendants will suffer prejudice without a stay, but Plaintiff will suffer no harm; (2) the pending Motion to Dismiss is dispositive, and the Court's ruling on that Motion will either moot or significantly narrow the disputed discovery issues between the parties; and (3) a stay will serve judicial economy and conserve party resources.

WHEREFORE, for the foregoing reasons and the reasons set forth in their Memorandum, Defendants Townstone Financial, Inc. and Barry Sturner respectfully request this Court to stay discovery pending the resolution of the Motion to Dismiss.

Dated: September 16, 2022

Respectfully submitted,

/s/ Steven M. Simpson

STEVEN M. SIMPSON

DC Bar No. 462553

JESSICA L. THOMPSON

DC Bar No. 1542170

Pacific Legal Foundation

3100 Clarendon Boulevard, Suite 1000

Arlington, VA, 22201

Tel: (916) 288-1398

SSimpson@pacificlegal.org

JLThompson@pacificlegal.org

OLIVER DUNFORD

FL Bar No. 1017991

Pacific Legal Foundation

4440 PGA Boulevard, Suite 307

Palm Beach Gardens, FL 33410

Tel: (916) 503-9060

ODunford@pacificlegal.org

Sean P. Burke

Mattingly Burke Cohen & Biederman LLP

155 E. Market St. Suite 400

Indianapolis, IN 46204

Marx David Sterbcow

The Sterbcow Law Group LLC

824 Elmwood Park Boulevard, Suite 205

New Orleans, LA 70123

**CERTIFICATE OF SERVICE**

The undersigned hereby certify that on September 16, 2022, I electronically filed the foregoing document with the Clerk of the Court via the CM/ECF system, which will cause a copy to be served upon counsel of record.

/s/ Steven M. Simpson  
STEVEN M. SIMPSON